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*Counsel for movant Tempus International Fund
SPC and Opportunity Unique Fund Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KALMAN ISAACS, individually and on
behalf of all others similar situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Case No.: 3:18-cv-04865-EMC

**DECLARATION OF
LAURENCE D. KING IN SUPPORT OF
TEMPUS INTERNATIONAL FUND SPC
AND OPPORTUNITY UNIQUE FUND
INC.'S OPPOSITION TO COMPETING
MOTIONS AND IN FURTHER
SUPPORT OF THEIR MOTION FOR (1)
CONSOLIDATION OF RELATED
ACTIONS; (2) APPOINTMENT AS
LEAD PLAINTIFF; AND (3) APPROVAL
OF THEIR CHOICE OF LEAD
COUNSEL**

Judge: Edward M. Chen
Courtroom: 5
Date: November 15, 2018
Time: 1:30 p.m.

[Additional Captions Below]

1 WILLIAM CHAMBERLAIN, on behalf of
2 himself and all other similarly situated

3 Plaintiff,

4 v.

5 TESLA, INC. and ELON MUSK,

6 Defendants.

Case No.: 3:18-cv-04876-EMC

7 JOHN YEAGER, Individually and on Behalf of
8 All Others Similarly Situated,

9 Plaintiff,

10 v.

11 TESLA, INC. and ELON MUSK,

12 Defendants.

Case No.: 3:18-cv-04912-EMC

13 CARLOS MAIA, on behalf of himself and all
14 other similarly situated,

15 Plaintiff,

16 v.

17 TESLA, INC. and ELON MUSK,

18 Defendants.

Case No.: 3:18-cv-04939-EMC

19 KEWAL DUA, Individually and on Behalf of All
20 Others Similarly Situated,

21 Plaintiff,

22 v.

23 TESLA, INC. and ELON MUSK,

24 Defendants.

Case No.: 3:18-cv-04948-EMC

JOSHUA HORWITZ, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

TESLA, INC. and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-05258-EMC

ANDREW E. LEFT, Individually and on Behalf
of All Other Similarly Situated,

Plaintiff,

v.

TESLA, INC., and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-05463-EMC

ZHI XING FAN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

TESLA, INC., and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-05470-EMC

SHAHRAM SODEIFI, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TESLA, INC., a Delaware corporation, and
ELON R. MUSK, an individual,

Defendants.

Case No.: 3:18-cv-05899-EMC

1 I, Laurence D. King, hereby declare as follows:

2 1. I am a partner at the law firm of Kaplan Fox & Kilsheimer LLP. I respectfully submit
3 this Declaration in Support of Tempus International Fund SPC and Opportunity Unique Fund Inc.'s
4 Opposition to Competing Motions and in Further Support of Their Motion for (1) Consolidation of
5 the Related Actions; (2) Appointment as Lead Plaintiff; and (3) Approval of Their Choice of Lead
6 Counsel. If called as a witness, I could and would competently testify thereto to all facts within my
7 personal knowledge.

8 2. Attached hereto as Exhibit A is a true and correct copy of the NFA Regulatory
9 Actions concerning Andrew M. Left obtained on October 23, 2018 from www.nfa.futures.org.
10 Highlights were added by counsel.

11 3. Attached hereto as Exhibit B are true and correct copies of the following documents
12 concerning an Enforcement Committee Decision by the Autorité des Marchés Financiers (the
13 "AMF") concerning Thierry Boutin ("Boutin") pursuant to which Boutin was fined €1.2 million by
14 the AMF for insider market abuse and breaches:

15 B-1: February 26, 2008 AMF Press Release;

16 B-2: English Translation by Google Translator of AMF publication dated
17 February 27, 2008 of December 6, 2007 Decision by the AMF; and

18 B-3: AMF publication dated February 27, 2008 of December 6, 2007 Decision by
19 the AMF in French.

20 4. Attached hereto as Exhibit C are true and correct copies of the following concerning
21 an Enforcement Committee Decision by the AMF concerning Boutin pursuant to which Boutin was
22 fined €500,000 by the AMF for insider market abuse and breaches:

23 C-1: English Translation by Google Translator of June 16, 2008 AMF Decision.

24 C-2: June 16, 2008 Decision by the AMF in French.

25 5. Attached hereto as Exhibit D is a true and correct copy of the October 10, 2016 Order
26 in *In re Tesla Motors, Inc. Stockholder Litig.* C.A. No. 12711-VCS (Del. Ch.) (the "Tesla Derivative
27 Action") appointing Robbins Geller Rudman & Dowd LLP as Co-Lead Counsel in the Tesla
28 Derivative Action.

